

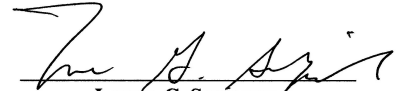
Application **GRANTED**. The deadline for the parties to file the joint letter and proposed civil case management plan and scheduling order is extended to **August 21, 2024**.

The initial pretrial conference scheduled for August 7, 2024, is adjourned to **August 28, 2024**, at 4:00 P.M. At that time, the parties shall call 888-363-4749 and enter the access code 558-3333.

VIA CM/ECF

The Honorable Lorna G. Schofield
The United States District Court
for the Southern District of New York
40 Foley Square
New York, NY 10007

Dated: August 5, 2024
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: *Wahab v. Direct Marketing Ventures, LLC*; Case No. 1:24-cv-04700-LGS

Dear Judge Schofield:

This law firm represents Defendant Direct Marketing Ventures, LLC (“DMV”) in the above-captioned matter. We write ***on consent*** to request an adjournment of the deadlines to file a joint letter and proposed case management plan and the initial conference, currently scheduled for August 5 and 7, 2024, respectively (*see* D.I. 5, 9)

On July 25, 2024, the Court granted DMV’s first extension of time to answer or otherwise respond to Plaintiff Angela Wahab’s (“Plaintiff”) Complaint, making this response due August 14, 2024. (D.I. 8.) The parties are actively engaged in settlement negotiations and this adjournment request will allow the parties to continue their settlement efforts without the need for further litigation. Because the deadline to file a joint letter and proposed case management plan and initial conference are currently scheduled to take place *before* DMV answers or otherwise responds to Plaintiff’s Complaint, and because the parties are actively working to resolve the dispute without the need for further litigation, we believe the requested adjournment is in the best interest of the parties and will serve to conserve judicial resources.

As indicated above, counsel for DMV has been in contact with Plaintiff’s counsel, who consents to this request for an adjournment of D.I. 9 and D.I. 5. This adjournment request does not affect any other scheduled dates or deadlines. Accordingly, DMV respectfully requests an adjournment of the deadline to file a joint letter and proposed case management plan until and including **August 21, 2024**. DMV further respectfully requests the Court adjourn the upcoming initial conference to a date convenient for the Court, but following August 21, 2024.

We thank the Court for its time and attention to this matter.

Respectfully Submitted,

BENESCH, FRIEDLANDER,
COPLAN & ARONOFF LLP

/s/ Deana S. Stein
Deana S. Stein (DS5047)

DSS:nbt

cc: All counsel of record (via CM/ECF)